

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

CAROLYN BETTON, et al.,

Plaintiffs,

v.

ST. LOUIS COUNTY, MISSOURI,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 4:05CV1455 (JCH)

DECLARATION OF M. BETH FETTERMAN

M. Beth Fetterman states as follows:

1. I am an attorney with the law firm of Sowers & Wolf, LLC. I make this Declaration of my own personal knowledge.
2. I work under the direction D. Eric Sowers and Ferne P. Wolf.
3. On or about March 17, 2010, as Ms. Wolf was preparing plaintiffs' Bill of Costs, I contacted Midwest Litigation to see if plaintiffs' former attorney, Eric Tolen, had any outstanding costs related to this case because we saw that the transcripts for plaintiffs' depositions had been prepared by Midwest Litigation.
4. I spoke with Midwest's Billing Supervisor, Kim Pauley.
5. Ms. Pauley stated the invoices for the deposition transcript copies had not been paid by plaintiffs' attorney.
6. I told Ms. Pauley that we would present the invoices to the Court as a part of the Bill of Costs is she provided us with copies.
7. Ms. Pauley sent me the invoices which have been previously produced to this Court.

8. This firms sole intent in obtaining the invoices for depositions conducted by Eric Tolen was to produce a thorough, comprehensive Bill of Costs to the Court and to ensure that all parties who provided services related to this case were properly compensated.

9. I did not bill for my time in recovering these invoices from Midwest Litigation.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed:

May 12, 2010


M. Beth Fetterman